

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

CHARLES A. WAKEFIELD,

Plaintiff,

vs.

SODEXO USA,

Defendant.

Case No. CIV-17-1006-R

**DEFENDANT SODEXO OPERATIONS, LLC'S  
OBJECTIONS TO PLAINTIFF'S FINAL EXHIBIT LIST**

Defendant Sodexo Operations, LLC ("Sodexo") submits the following objections to the exhibits identified in the Plaintiff's Final Exhibit List:

<b>No.</b>	<b>Description</b>	<b>Objection</b>	<b>Rule(s)</b>
1.	EEOC file; Charge No. 564-2017-00183	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (if specific documents from the EEOC file are identified, Defendant may waive objection)	401–403, All objections reserved until properly identified.
2.	EEOC file; Charge No. 564-2016-00573	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (if specific documents from the EEOC file are identified, Defendant may waive objection)	401–403, All objections reserved until properly identified.
3.	Plaintiff's EEOC records for 564-2016-00573	Insufficient Identification	All objections reserved until properly identified.
4.	Plaintiff's EEOC records for 564-2016-1475	Insufficient Identification	All objections reserved until properly identified.

<b>No.</b>	<b>Description</b>	<b>Objection</b>	<b>Rule(s)</b>
5.	Plaintiff's EEOC records for 564-2017-00183	Insufficient Identification	All objections reserved until properly identified.
6.	Plaintiff's OESC Notice of Determination	Inadmissible by Statute	40 O.S. § 2-610.1
7.	March 15, 2016 Email stream between Plaintiff and Paula Palermo re: Fw: QC Inspection	Relevance, Confusion of the Issues, Waste of Time, Hearsay if offered by Plaintiff, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3478-3479)	401-403, 801-802, All objections reserved until properly identified.
8.	February 29, 2016, Email from Kelly Otis to Plaintiff re: Reagan Elementary	Relevance, Confusion of the Issues, Waste of Time, Hearsay if offered by Plaintiff, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3477)	401-403, 801-802, All objections reserved until properly identified.
9.	July 21, 2015, Email stream between Lisa Failing and Plaintiff re: Environmental Services Manager 2 Salary	Rule of Completeness, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3472-3474)	106, All objections reserved until properly identified.
10.	January 27, 2015, email from Plaintiff to Kevin Benda re: Discussion Item	Insufficient Identification, Unfair Surprise (document has not been provided to Defendant)	All objections reserved until the document is produced and properly identified.
11.	March 22, 2015, Email from Kevin Benda to Charles Wakefield re: Patricia O'Hara's Report	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3471)	401-403, All objections reserved until properly identified.
12.	February 28, 2015, Email from Plaintiff to Chris Crelia re: Visit	Relevance, Confusion of the Issues, Waste of Time, Hearsay if offered by Plaintiff, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3470)	401-403, 801-802, All objections reserved until properly identified.

<b>No.</b>	<b>Description</b>	<b>Objection</b>	<b>Rule(s)</b>
13.	February 20, 2015 Email from Plaintiff to Linda B., no subject	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3469)	401–403, All objections reserved until properly identified.
14.	February 14, 2015, Email stream between Plaintiff and Carol Burton re: New Custodian	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3468)	401–403, All objections reserved until properly identified.
15.	February 14, 2015, Email stream between Plaintiff and Linda Parsons re: Cleaning	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3467)	401–403, All objections reserved until properly identified.
16.	February 11, 2015, Email stream between Plaintiff and Carol Burton re: Site Visit	Relevance, Confusion of the Issues, Waste of Time, Hearsay if offered by Plaintiff, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3466)	401–403, 801–802, All objections reserved until properly identified.
17.	February 6, 2015, Email stream between Plaintiff and Kevin Benda, re: Site Visit	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3465)	401–403, All objections reserved until properly identified.
18.	February 4, 2015, Email stream between Plaintiff and Chris Crelia re: rooms 11, 12, 14 and 15	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3464)	401–403, All objections reserved until properly identified.
19.	February 1, 2015, Email stream between Plaintiff and Susan Powell re: QC Inspection	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3462–3463)	401–403, All objections reserved until properly identified.
20.	January 16, 2015, Email stream between Plaintiff and Chris Crelia re: QC Inspection	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3460)	401–403, All objections reserved until properly identified.

<b>No.</b>	<b>Description</b>	<b>Objection</b>	<b>Rule(s)</b>
21.	January 14, 2015 8:40 a.m., Email stream between Plaintiff and Paula Palermo re: QC Inspection	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3457-3458)	401–403, All objections reserved until properly identified.
22.	January 14, 2015, 8:13 a.m., Email stream between Plaintiff and Paula Palermo re: QC Inspection	Relevance, Confusion of the Issues, Waste of Time, Hearsay if offered by Plaintiff, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3459)	401–403, 801–802, All objections reserved until properly identified.
23.	January 6, 2015, Email stream between Plaintiff and Kevin Benda, re: Write Ups	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3455-3456)	401–403, All objections reserved until properly identified.
24.	January 28, 2015, Email stream between Plaintiff and Carol Burton re: Cleaning Crew	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3461)	401–403, All objections reserved until properly identified.
25.	December 4, 2014, Email stream among Plaintiff, Kevin Benda, and Blayke [William] Humphrey re: Needs	Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3452-3453)	All objections reserved until properly identified.
26.	December 4, 2014, Email stream between Plaintiff and Kevin Hogan re: Cleaning	Relevance, Confusion of the Issues, Waste of Time, Hearsay, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3451)	401–403, 801–802, All objections reserved until properly identified.
27.	December 19, 2014, Email stream between Plaintiff and Kevin Benda, re: Concerns	Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3454)	All objections reserved until properly identified.
28.	FY15 Performance Review for Plaintiff	Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3495–3510)	All objections reserved until properly identified.

<b>No.</b>	<b>Description</b>	<b>Objection</b>	<b>Rule(s)</b>
29.	February 23, 2016, Constructive Counseling Notice for Non-Exempt	Rule of Completeness (It is presumed Plaintiff is referring to WAKEFIELD 3515–3518)	106, All objections reserved until properly identified.
30.	September 16, 2015, Constructive Counseling Letter with Action Plan	Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3487–3493)	All objections reserved until properly identified.
31.	January 19, 2016, Constructive Counseling Notice for Non-Exempt	Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 3511–3514)	All objections reserved until properly identified.
32.	Custodial Shift Report – December 18, 2013 through February 22, 2016	Relevance, Confusion of the Issues, Waste of Time, Insufficient Identification (It is presumed Plaintiff is referring to WAKEFIELD 0001–3450)	401–403, All objections reserved until properly identified.
33.	All exhibits produced through depositions taken in this case	Insufficient identification	All objections reserved until properly identified.
34.	All exhibits listed by Defendant, unless otherwise objected to	Insufficient identification	All objections reserved until properly identified.
35.	Discovery is ongoing. Plaintiff reserves the right to supplement this list.	Insufficient identification	All objections reserved until properly identified.

Respectfully submitted,

s/Jeremy Tubb

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*Attorneys for Defendant Sodexo*

### **CERTIFICATE OF SERVICE**

I hereby certify that on December 13, 2018, I electronically transmitted the foregoing document to the Court Clerk using the ECF System for filing. The Court Clerk will transmit a Notice of Electronic Filing to the following ECF registrants:

Melvin C. Hall  
Riggs, Abney, Neal, Turpen,  
Orbison & Lewis  
528 NW 12<sup>th</sup> Street  
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s/Jeremy Tubb

Jeremy Tubb